

23 MAR 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FILE

Mr. Robert Dick
Environmental Coordinator
John Deere Harvester Works
1100-13th Avenue
E. Moline, Illinois 61244

1618100015 - Rock Island Co.
Re: Notice of Violation
John Deere Harvester Works
ILD 025 423 054

Dear Mr. Dick:

COMPLIANCE

On January 24, 1989, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The Land Disposal Restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;
2. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7(a); and
3. Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifests number, and waste analysis data, where available, as required by Section 268.7(a)(1).

EPA Region 5 Records Ctr.



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A copy of the inspection report is enclosed for your records. please submit to this office, within thirty (30) days of receipt of this Notice of Violation, and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA
Glen Savage, IEPA